

REMARKS***A. Overview***

Claims 1-22 were pending in the present application. Claims 2-6 and 10 have been found allowable if appropriately rewritten.

It is respectfully submitted that this response places the allowable claims in allowable form. It also argues for allowability of other claims. Reconsideration is respectfully requested.

B. Allowable Claims

New independent claim 23 contains the limitations of original claims 1 and 2. Therefore, it is respectfully submitted it is allowable as original claim 2 was found allowable if rewritten to include its limitations and those of its base claim and any intervening claims. Claim 1 was the base claim of original claim 2 and there are no intervening claims.

New claims 24—27 have the limitations of original claims 3-6. Original claims 3-6 were dependent upon original claim 2. Therefore, new claims 24-27 are submitted to be allowable.

New claims 28-43 have the limitations of original claims 7-22 and are submitted to be allowable because they depend from allowable claim 23.

New independent claim 44 contains the limitations of original claims 1, 7, 8, 9 and 10. Therefore, it is respectfully submitted it is allowable as original claim 10 was found allowable if rewritten to include its base claim and any intervening claims. Claim 1 is the base claim of original claim 10, and claims 7-9 are intervening claims.

New claims 45-61 have the limitations of original claims 2-6 and 11-22 respectively, and are submitted to be allowable because they are dependent from allowable claim 44.

It is therefore respectfully submitted that claims 23-61 are allowable.

C. Title

The Examiner's suggested amendments to the Title have been adapted. It is respectfully submitted the new title is descriptive of one aspect of the present invention.

D. Drawings

The Office Action raised several questions regarding reference numerals in the drawings and specification, and words used with some of the reference numerals. It is respectfully submitted that amendments to the specification have been made which remedy most of the issues raised.

Specifically, the specification has been amended to make the reference numerals and terminology more consistent throughout the specification regarding the matters raised in numbered paragraphs 4 and 5 of the Office Action. Changes to the drawings are not believed required after those changes to the specification.

Proposed revisions to Figure 6A have been made (*see* attached drawing sheet labeled "REPLACEMENT SHEET") in response to the issues raised at numbered paragraph 6 of the Office Action. Approval of the changes is respectfully requested.

E. Specification

Page 6, lines 16-17 have been changed in the way suggested by the Examiner.

F. Claim Objections

The dependency of claim 2 has been indicated in the manner suggested by the Examiner.

The Office Action alleges there is lack of written description for claim 22. This is respectfully traversed. First, its immediately preceding claim 21 describes a method step of "redirecting light from a portion of the HID light source that would otherwise leave the arc tube back towards a portion of the arc tube." Applicants' specification page 9, lines 11-14 state:

It is believed that use of UV coating 110 and/or reflective coating 112, and the resulting redirection of light energy back through lamp 100 may increase lamp life for lamp 100. It is believed that the reason is that there is a more uniform heating of the arc generated by the HID lamp.

The term "isothermal" means:

Main Entry: **iso·ther·mal** **adj**

Pronunciation: "I-s&-th&r-m&l

Function: *adjective*

Etymology: French *isotherme*, from *is-* + *-therme* (from Greek *thermos* hot) -- more at **THERM**

1 : of, relating to, or marked by equality of temperature

2 : of, relating to, or marked by changes of volume or pressure under conditions of constant temperature

- **iso·ther·mal·ly** **adv** /-m&-l&/ *adverb*

See Merriam-Webster On-line Dictionary at www.m-w.com. Therefore, Applicants'

specification provides explicit written description of claim 22. The coatings or reflectors which redirect a part of the light energy from the light source back to a portion of the light source promote more uniform or constant, that is more isothermal, temperature at the light source.

Note also that Serial No. 09/076,277 is incorporated by reference. Additional description can be found there.

G. Section 102 Rejection

Claims 1, 7-9, 11, 16-18, and 21 have been rejected as anticipated under 35 U.S.C. § 102 by U.S. Patent 5,707,142 to Gordin (hereafter "Gordin '142"). This rejection is respectfully traversed.

To present a *prima facie* case of anticipation, it must at least appear that the cited patent:

- (a) discloses with substantial identity;
- (b) each of the critical elements of the claimed invention, in the arrangement of the claim;

(c) as interpreted by one of ordinary skill in the art.

It is first important to note that Gordin '142 is commonly owned with the present application and has common inventors, including inventor Gordin. Gordin '142 is a very focused invention directed to a particular type of fixture. As seen in the drawings of Gordin '142, the fixture is supported on a trunnion 14. An enclosure 16 mounted on trunnion 14 includes ballasts and other electrical components. See Gordin '142, Col. 1, lines 36-47. The reflector has a front portion 26 and a rear portion or door 38 separated by a main housing ring 15. Trunnion 14 is pivotally attached to ring 15. The reflector can be tilted by rotating it about that pivot connection. An inner rear reflector 28 is mounted inside the main reflector housing. Gordin '142 is focused upon a unique way of mounting that inner rear reflector 28.

In comparison, Claim 1 of the present application calls for a combination of, *inter alia*, "(a) a bulb cone, (b) a mounting connection adapted to mount the bulb cone to a support; (c) a reflector having a portion adapted for connection to the bulb cone and an opening adapted to be covered by a lens." As seen in the embodiment of Applicants' drawings, bulb cone 12 is removably bolted to the back of reflector 18. A mounting elbow 14 is connected to the back of bulb cone 12. Mounting elbow is adapted to be bolted to a support such as a cross arm on a light pole.

Gordin '142 does not have the above combination. It does not have a bulb cone, a mounting connection to mount the bulb cone to a support and the reflector adapted to connect to the bulb cone. Therefore, a *prima facie* case of anticipation is not made out by Gordin '142 for Applicants' claim 1.

Claims 7-9, 11, 16-18, and 21 are dependent upon claim 1 and are therefore likewise not anticipated by Gordin '142 for the reasons expressed in support of claim 1.

H. Section 103 Rejection

Claim 12-15, 19 and 20 have been rejected as obvious under 35 U.S.C. § 103 on the basis of Gordin '142 in combination with McIngvale, Jr. U.S. Patent 4,918,582 (hereafter "McIngvale"). This rejection is respectfully traversed.

McIngvale is what is called a "trough" reflector lighting fixture. Note how its reflector is elongated along the longitudinal axis of the light source. It basically wraps around the length of the arc tube. There is no disclosed bulb cone, or mounting connection to mount a bulb cone to a support, or connection of the reflector to the bulb cone. McIngvale does not fill the gap between Gordin '142 and Applicants' claim 1. Like Gordin '142, it does not teach the combination of Applicants' claim 1.

To make out a *prima facie* case of obvious, the following must be shown:

- (a) the cited references must teach;
- (b) a reason, suggestion, or motivation to combine or modify themselves;
- (c) in a manner which appears to show or suggest the claimed invention;
- (d) to one of ordinary skill in the art.

The lack of any disclosure of the combination of Applicants' claim 1 by either Gordin '142 or McIngvale prevents those two references from meeting the standard for a *prima facie* case of obviousness. There is no motivation to modify either one in such a way. Therefore, it is respectfully submitted that Applicants' claims 12-15, 19 and 20, dependent from claim 1, are not obvious for the reasons expressed in support of claim 1.

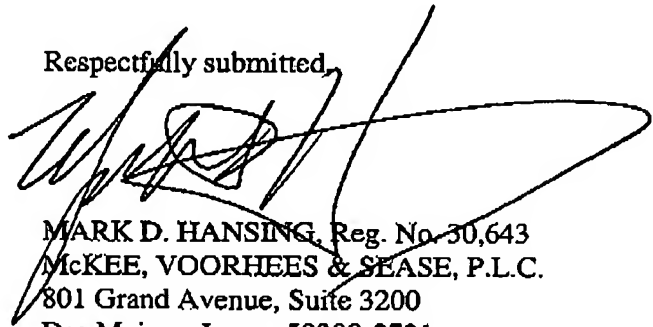
I. Conclusion

It is respectfully submitted that all matters raised by the Office Action have been addressed and remedied, and that the present application is in form for allowance. Favorable action is respectfully requested.

Please also consider this a 3 month extension of time from September 25, 2004 to December 27, 2004 and charge Deposit Account No. 26-0084 the amount of \$3,420 (\$1,020 for extension of time and \$2,400 for new claims (2 new independent claims X \$200= \$400 and 40 new claims total X \$50=\$2,000). No additional fees or extensions of time are believed to be due in connection with this amendment; however, consider this a request for any extension inadvertently omitted, and charge any additional fees to Deposit Account No. 26-0084.

Reconsideration and allowance is respectfully requested.

Respectfully submitted,



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Attachments--Proposed Replacement Sheet of Drawings